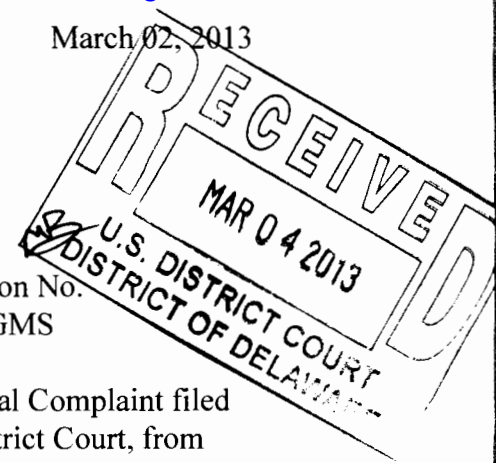


March 02, 2013

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KAROLINA KARPOV,
Plaintiff,

Civil Action No.
12:1411-GMS



-against-

VLADIMIR KARPOV and
SVETLANA KARPOV
Defendants.

Answer to Original Complaint filed
In New York District Court, from
Svetlana Karpov, Defendant.

Defendants Svetlana Karpov (hereinafter referred to as "Defendant or I"), hereby
respond to Plaintiff's Complaint (the "Complaint"), as follows:

ANSWERING ALLEGATIONS

1. Deny- none of these actions were caused by me.
2. Deny- the court of the State of New York does not have the right to hear this case as it has no jurisdiction over defendants.
3. Deny- The court of the state of New York does not have the right to hear this case as it has no jurisdiction over defendants.
4. Deny-The court of the state of New York does not have the right to hear this case as is has no jurisdiction over defendants.
Paragraphs 5-8 are subject to investigation.
9. Deny- I do not believe any of these allegations to be true.
10. Deny- I do not believe this allegation to be true as I was never a witness to any of the acts plaintiff claims happened while residing in the Delaware residence.
11. Deny- Karolina came into our home at the age of 7 years, 8 months, and was peacefully returned to her foster family at the age of 13 years and 2 months.
12. Deny- Karolina is not a black female. On the contrary, she is white, which can be proven by official documentation. Upon adoption, Defendants

Vladimir Karpov and I were told we could decide to either put “black” or “white” on all documents. Karolina is bi-racial, but considered white.

13. Admit- All listed children are Karolina’s adoptive siblings.

14. Admit- a.

Admit-b. Clarification- Presently Deceased but Alive while Karolina resided with Defendants.

Admit-c. Clarification- Presently Deceased but Alive while Karolina resided with Defendants.

Admit-d.

15. Admit-a.

Admit-b.

Admit-c.

16. Deny- Vladimir Vysotskiy Senior

17. DENY- Karolina’s original FOSTER parents, in Ukraine, were Annya & Slavik Horbatiyy

18. Admit

19. Admit

20. Admit

21. Deny- Vladimir is 56 years old

22. Deny- Vladimir built a substantial real estate business from 1999-2007, which then in 2009, went under bankruptcy.

23. Deny- Vladimir is incarcerated in JTVCC

24. Not Sure

25. Not sure

26. Not sure

27. Not sure

28. Deny- Vladimir was accused of sexual abuse of Karolina, but there was never any medical evidence to prove that Karolina was raped. Vladimir accepted a plea bargain so that he wouldn’t spend the rest of his life in prison.

29. Admit & Deny- I am aware that Vladimir cannot contact Karolina, by court order, but I have never seen a court order that he cannot contact plaintiff's family or residence (not that he would want to). Vladimir can have contact with all his children who are under 18.
30. Deny- this is lie.
31. Deny- I spoke with my daughter Olga Mervyak. Olga claims she has never said this.
32. Deny- I am no longer domiciled in Delaware.
33. Admit
34. Admit
35. Admit
36. Deny- I am 43 years of age.
37. Deny- I have not signed anything over to myself.
38. Deny- Slavik and Annya Horbatiyy begged Vladimir and me, Svetlana Karpov, to take Karolina to the United States so that Karolina would have a better life and children wouldn't harass her in school. They wanted Karolina to feel accepted and in Ukraine that wasn't so. Annya Horbatiyy claimed that it was very difficult to discipline Karolina from early childhood, as Karolina would lie about anything and everything.
39. Deny-Karolina was never adopted by Annya Horbatiyy and Slavik Horbatiyy. They foster parented Karolina while she was in Ukraine. Karolina's biological mother, who is Ukrainian, is deceased and no one is aware of who the father is. Also, she never attended college.
40. Deny
41. Deny- Annya Horbatiyy pleaded for Vladimir to take Karolina, as explained before in paragraph 38.
42. Deny- It took Karolina a while to get accustomed to our home. She was very shy and timid, but upon learning the English language, she was doing well in school as well as in the home.

Paragraphs 43-58. Deny- I was never a witness, and as stated in all the investigatory and prosecutorial data, I was never aware or around when any of the acts that Karolina alleges, occurred.

59. Deny- This allegation never occurred

60. Deny- This allegation is a lie and this never occurred.

61. Deny- I always told Karolina that I love her and accept her as my own daughter.

62. Deny- This allegation is mockery.

63. Deny- This allegation is a lie. Olga and I travelled to Ukraine in 2003. I was pregnant at that time with the 12th child, and the pregnancy was high risk because of the thyroid disease. In Ukraine, I was seen by a thyroid specialist.

Paragraphs 64-67. Deny- these allegations are all false as I never witnessed any of the acts described by Karolina for all time that she lived with me and my family!

68. Deny- Vladimir never avoids my mother, Karolina's adoptive grandmother, and never has. He has the utmost respect for her and loves and appreciates her. Also, my mother states she has never suspected anything like the allegations that Karolina states. She was never suspecting anything at any time.

69. Deny- I never made Vladimir, Karolina's "tutor". Vladimir would help all the children with their homework after school, as well as Karolina. The children were always together, doing homework, studying, and doing projects. Also, Karolina did not fail school. She would try her best, and at times yes, she would bring home unacceptable grades, but she always tried her best.

70. Deny- This allegation NEVER occurred. It would have been documented, and I, as well as my husband, would be contacted by the child protective services, by protocol.

Paragraph 71-74. Deny- These allegations are mockery and defamation. I was never a witness to any of these allegations.

75. Deny- I always kept records and ledger balances of all finances, and knew where every penny was spent. Vladimir never made any contribution to any school, organization, or church that we attended. The school tuition is not a contribution, and church offerings were very small. We did make large contributions to orphanages in Ukraine though.

76. Deny

Paragraph 77-79. Deny- Karolina shared a bedroom at all times, as did the rest of the children. Boys had their own rooms and girls had their own as well. Karolina shared her room with different girls all the time. There were 19 people living in the house, 13 children, 2 “grandpas”, 1 “grandma”, 1 aunt, and my husband and I. No one ever reported at any time that Karolina spent nights crying or something was happening. She was always a very happy child.

80. Deny- Defamation! Karolina is stating such allegations that never occurred. This allegation would definitely be in all privileged records, and it isn't. On the contrary, all records state that “Vladimir would (impose actions) when Svetlana wasn't around.” Clearly Karolina's story develops drastically.

81. Deny

82. Deny

83. Deny- I never beat Karolina. All children, grandparents, and close family members, can witness that Karolina was almost never disciplined by belt, much less, beaten. This allegation is made up to try and have something against me for which I can be blamed. I was never blamed for any such act on any of my children, including Karolina.

84. Deny- This is defamation.

85. Admit- Karolina did accept me as her adoptive mother and did love me. We never had problems between each other. We spent family time together with the all children and my mother, travelling to different states, visiting friends and family.

86. Deny- This allegation is a lie. I never beat Karolina, tied her nor did I keep her from school. Her attendance records are very good actually.

87. Deny

88. Deny- I literally have no words for these allegations.

89. Deny

90. Deny

91. Deny

92. Deny

93. Deny

94. Deny

95. Deny

96. Deny

97. Deny- This allegation never occurred.

98. Deny

99. Deny- Alexandra (Zaloznaya) Sitnik, referred to as Sasha by Karolina, decided marriage would be the best option for her since she didn't want to be dependent on me or my husband, and married. There is not "set" Ukrainian tradition, as claimed by Karolina in paragraph 97. Also, Sasha did date more than one man. She brought to our home a gentleman to introduce him to the family, but decided that marrying him would be a mistake, so she settled for another gentleman. She dated just like any regular teenage girl. At age 22 she married her husband.

100. Deny

101. Deny

102. Deny- We were all very excited Karolina's foster family was coming, and made several visits to the family before Karolina decided to live with them. Karolina never demanded to visit them.

103. Deny

104. Deny- Annya Horbatiyy asked Vladimir and I to allow Karolina to live with them since she was originally from their family. Vladimir then arranged with Annya and Slavik Horbatiyy a family reunion and Karolina was cordially and peacefully written over to the Horbatiyy Family.

105. Deny- This allegation never happened. This allegation is completely absurd.

106. Deny- Karolina never spoke to me about any of this. Before she left to live with Horbatiyy Family, I personally spoke to Karolina and she never admitted anything, nor did she ever speak about anything. She said that she missed her foster family, and would like to move in with them.

107. Deny

108. Admit and Deny-

a. Deny- We lived in this residence while Karolina was with us.

b. Admit- This property was mortgaged in 2006 to house workers that worked on the apartment complex.

c. Deny- This was really never our property. Vladimir and I purchased this property and rewrote the deed in 2006 to Andrey Karpov, while the property was mortgaged. This was Andrey Karpov's condominium which he lost to foreclosure a while ago.

d. Admit

e. Admit

a. Deny- There is no such pre-existing or existing LLC

b. Admit

c. Admit

109. Deny- Since Karolina has moved from our residence, she has continued to move on from her foster family, then to an aunt, then onto her own, and so on. I do not know what has happened to her or where she is, since she has left my care. There is no evidence to prove that she has post-traumatic stress disorder occurring from living with my family.

110. Deny- There is no proof of this ever happening or that her supposed attempt at suicide was from events that occurred while living in our home.

111. Deny- Again, there is no proof of this.

112. Deny- These allegations were all written by Vera and Peter Lomtevas, therefore none of these allegations are true.

113. Deny

114. Deny

115. Deny

116. Deny- Karolina has graduated early from high school. She completed her high school course well enough to be considered an early graduate. She went on to Ridley Lowell Business and Technical School to become a cosmetologist. She is pursuing her career. She mentioned this to my daughter Victoria Kryachkov while we both came to Dutchess County Family Court for a trial regarding child support for Karolina Karpov.

117. Deny- Karolina has been employed at An Tyrice Beauty Salon as a receptionist for quite a while. Also, she babysits and finds other things to do.

118. Deny- Karolina was coached by Vera and Peter Lomtevas to become a public charge. In doing so, on her 18th birthday, Karolina became emancipated and left her aunt's residence to live on her own, and purposefully, as well as strategically, become a public charge.

119. Deny- Our family does not avoid Karolina. Karolina chooses not to communicate with us after she filed this case in court against us. On her previous and most recent birthday, my children have sent her flowers, birthday presents, and Christmas presents. On Thanksgiving 2010, Karolina even visited all of us in the Delaware Residence with the aunt that she lived with. We had tea time

together, pleasant conversations, and all the children and I were happy to be reunited.

120. Deny- This allegation is bogus. Vladimir has no intention of going back to prison.

121. Not applicable- there is nothing to share and I did not sexually or physically abuse Karolina.

Paragraph 122- 186. Deny- All allegations are false and can be proven that I was not involved. All privileged documents and every single testimony by every individual and organization that investigated the criminal case of Delaware State vs. Vladimir, states that Karolina Karpov says that I was not around and did not know of what was happening.

*Please take note that Vladimir Karpov already has a no-contact order issued by the judge relating to Karolina Karpov. There is no reason why a no-contact order should be issued upon me relating to Karolina.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

The Plaintiff's Complaint fails to state claims upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

Karolina Karpov's allegations are false. From the first to the last motion that Karolina has filed in the Family Court of Dutchess County of New York, to the first and last motion she has filed in the New York District Court as well as the Delaware District Court, her story and allegations change drastically. Therefore, it is almost impossible to distinguish the truth from her lies. And also, this motion was written by Peter and Vera Lomtevas.

RESERVATION OF RIGHTS CLAUSE

Defendants reserve the right to raise additional affirmative defenses.

WHEREFORE, judgment is demanded dismissing the Complaint against the Defendant, Svetlana Karpov, with prejudice, with costs and disbursements, including such other and further relief as this Court may find just and proper.

Dated: SET FORTH Lincoln, Nebraska
March 1, 2013


SVETLANA KARPOV

Affidavit of Service

I, Svetlana Karpov, am affirming that I have prepared and mailed this answer to:

1. The United States District Court of Delaware
J Caleb Boggs Federal Building
844 North King Street
Unit 18
Wilmington, DE 19801-3570
2. Plaintiff, Karolina Karpov
305 Mill Street
Apt 2A
Poughkeepsie, NY 12601
3. Defendant, Vladimir Karpov
1181 Paddock Road
SBI#433133
Smyrna, DE 19977
4. Defendant, Kristina Multani
402 Blaine Avenue
Apt 2nd
West Berlin, NJ 08091
5. Defendant, Victoria Kryachkov
PO BOX 80245
Lincoln, NE 68501
6. Defendant, Emily Karpov
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Newark, DE 19713-1102

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